

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

FRONTIER FISHING CORP.
Plaintiff,

v.

DONALD EVANS, Secretary of the
UNITED STATES DEPARTMENT OF
COMMERCE; AND CONRAD C.
LAUTENBACHER, JR., UNDER
SECRETARY FOR OCEANS AND
ATMOSPHERE/ADMINISTRATOR AND
DEPUTY UNDER SECRETARY

Defendants.

CIVIL ACTION
NO.: 04-11171-DPW

**AFFIDAVIT OF
HARRIET DIDRIKSEN**

I, Harriet Didriksen, of 74 North Street, Mattapoisett, MA, having been duly sworn,
hereby state:

1. I am the president of Frontier Fishing Corporation.
2. I have reviewed all of the legal bills and expenses associated with the defense of the NOV/NOPs assessed against F/V SETTLER.
3. Attached hereto as Exhibit "A" is a true and accurate copy of the legal bills totaling \$46,655.00 which Frontier Fishing Corporation paid to Attorney Pamela F. Lafreniere for her legal representation of Frontier Fishing Corporation in this matter.
4. Attached hereto as Exhibit "B" is a true and accurate copy of the legal bills totaling \$44,446.33 which Frontier Fishing Corporation paid to Attorney Timothy McHugh for his legal representation of Frontier Fishing Corporation in this matter.
5. Attached hereto as Exhibit "C" is a true and accurate copy of the legal bills totaling \$2,515.50 which Frontier Fishing Corporation paid to Clinton & Muzyka for its legal representation of Frontier Fishing Corporation in this matter.

6. Attached hereto as Exhibit "D" is a true and accurate copy of the legal bills totaling \$32,966.47 which Frontier Fishing Corporation paid to Attorney Stephen M. Ouellette for his legal representation of Frontier Fishing Corporation in this matter.

7. Attached hereto as Exhibit "E" is a true and accurate copy of the expert bills totaling \$1,178.50 which Frontier Fishing Corporation paid to Clifford Goudey for his expert opinions concerning this matter.

8. Attached hereto as Exhibit "F" is a true and accurate copy of the expert bills totaling \$2,040.00 which Frontier Fishing Corporation paid to DeAlteris Associates, Inc. for his expert opinions concerning this matter.

9. Attached hereto as Exhibit "G" is a true and accurate copy of the expert bills totaling \$30,039.00 which Frontier Fishing Corporation paid to GAO Associates for expert opinions concerning this matter.

10. Attached hereto as Exhibit "H" is a true and accurate copy of the expert bills totaling \$2,120.00 which Frontier Fishing Corporation paid to Filomena M. Silva for translational services for this matter.

11. Attached hereto as Exhibit "I" is a copy of an invoice for reporting services paid to Apex Reporting in the amount of \$1,217.25 in connection with the hearing in the underlying administrative action.

12. The total amount of all of the bills that Frontier Fishing Corporation has paid in defending this matter is \$163,178.05.

13. The sole asset of Frontier Fishing Corp. from the inception of the NOAA action through the present was the F/V SETTLER (ON620472), along with her federal fishing permit No. 410253. In 2004, the vessel was valued at \$850,000, as shown on the agreed value on her hull

policy, which is based on a valuation survey, and that is consistent with her valuation throughout this period of time. See a true and accurate copy of the hull policy marked as Exhibit "J" attached hereto. The scallop permits were initially issued by the National Marine Fisheries Service to the vessel, and have never been separately evaluated. I am informed that these permits may increase the value of the hull by \$1,500,000 to \$2,000,000. As such, the entire value of the corporation has never exceeded \$3,000,000 and has always been significantly less than \$7,000,000. See tax returns marked as Exhibit "K" attached hereto.

SIGNED UNDER THE PAINS AND PENALTIES OF PERJURY THIS 28th DAY OF
APRIL, 2006

/s/ Harriet Didriksen

HARRIET DIDRIKSEN